

Policy Memo: I-2-2014

Memo Name: Separation of Duties

☐ Policy Clarification

☒ Policy Change

☐ New Policy

Issue Date: March 26, 2014

Effective Date: May 1, 2014

Policy Memo Effective Until: Until Updated Policy Approved by USDA

Author: Marge Blankenship, WIC Clinic Services Coordinator
Susan Schoen, WIC Administrative Operations Coordinator

A change to how separation of duties is defined for the Nebraska WIC Program is being implemented. The new definition follows.

Separation of Duties is defined as: at a minimum two different staff must determine WIC eligibility of clients. One staff person must assess income and residency eligibility and identification, while a second person determines nutrition risk and assigns the food package. Either of these staff or a third WIC staff member may print and issue checks to the client.

The purpose of separating staff duties during certification and issuance of benefits is to strengthen program integrity and reduce the potential for fraud and abuse.

Reminder: A CPA must determine nutritional risk and assign a food package during a certification visit.

Special Situations: Whenever a clinic is unable to meet the separation of duties requirement the state office should be contacted for approval of an alternate plan.

A chart showing what combinations of staff meet the separation of duties requirement is included.